

ORIGINAL

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DONNELLY, J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

BLOOM, M.J.

LaQuan DeVota Harris

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

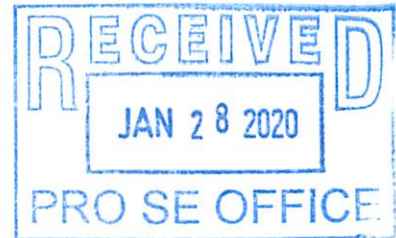
-against-

Gilford Gittens
James Sowell, Cyrus Robert Vance, D.R.
Nitin Savur, Chauncey Parker
Michael Sachs, John Zwin, Carey Dunne

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil
Rights

(Non-Prisoner Complaint)

Case No. **CV 20 - 522**
(to be filled in by the Clerk's Office)Jury Trial: ☐ Yes ☒ No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in *forma pauperis*.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>LaQuan DeVota Harris</u>
Street Address	<u>91-93 East 46th Street</u>
City and County	<u>BROOKLYN Kings</u>
State and Zip Code	<u>New York 11203</u>
Telephone Number	<u>914 888 7283</u>
E-mail Address	<u></u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	<u>James Sowell</u>
Job or Title (if known)	<u>DA offices</u>
Street Address	<u>One Hogan place</u>
City and County	<u>one Hogan place Man</u>
State and Zip Code	<u>Manhattan New York 10013</u>
Telephone Number	<u>212 335 9000</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name

Nitin Savur

Job or Title
(if known)

DA Office

Street Address

One Hogan place

City and County

Manhattan

State and Zip Code

NY 10013

Telephone Number

212 335 9000

E-mail Address
(if known)

Defendant No. 3

Name

Michael Sachs

Job or Title
(if known)

DA Office

Street Address

~~163~~ West 125 St

City and County

Manhattan

State and Zip Code

NY 10027

Telephone Number

212 864-1884

E-mail Address
(if known)

Defendant No. 4

Name

John Irwin

Job or Title
(if known)

DA Office

Street Address

530 West 166th suite 600A

City and County

Manhattan

State and Zip Code

New York 10032

Telephone Number

212 335 5520

E-mail Address
(if known)

Defendant No. ~~9~~ 5

Name

Gilford Gittens

Job or Title
(if known)

DA office

Street Address

one Hogan place

City and County

Manhattan

State and Zip Code

NY 10013

Telephone Number

212 335 9000

E-mail Address
(if known)

Defendant No. 6

Name

Corey Dunne

Job or Title
(if known)

DA office

Street Address

one Hogan place

City and County

Manhattan

State and Zip Code

NY 10013

Telephone Number

212 335 9000

E-mail Address
(if known)

Defendant No. 4

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

Defendant No. 87
Name Cyrus Robert Vance JR.
Job or Title DA Office
(if known)
Street Address One Hagan Place 1
City and County Manhattan
State and Zip Code New York 10013
Telephone Number 212 335 9000
E-mail Address _____
(if known)

Defendant No. 85
Name Gilford Gittens
Job or Title DA Office
(if known)
Street Address 163 West 175 St
City and County Manhattan
State and Zip Code NY 10027
Telephone Number 212 864 7884
E-mail Address _____
(if known)

Defendant No. 88
Name Chauncey Parker
Job or Title DA Office
(if known)
Street Address 530 West 166th Suite 600 A
City and County Manhattan
State and Zip Code NY 10032
Telephone Number 212 335 3320
E-mail Address _____
(if known)

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Amendment-5-Right of person Violation
 Amendment-6-Rights of Accused in
 criminal prosecutions Amendment-8-Further Guarantee
 in Criminal Cases.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

MR Harris was falsely arrested, Perjury proclaimed
 theft of Nystabe Legal Documentation ID theft
 Money/Ordering. Excessive bail cruel and unusual
 punishment were inflicted all in All False testimony

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Excessive bail was required cruel and
 unusual punishments were inflicted
 False testimony on DAS behalf & Arresting
 Officers perjury & Framing MR Harris

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

west 28th st & west 34th man, NY Nov 7, 18.
New York city transit train platform 34th.
theft Bank Card ID card cell phone
keys to apartment mail box key money stealing

- B. What date and approximate time did the events giving rise to your claim(s) occur?

At 3:15 pm on Nov 7, 2018 Gilford
Gittens of Address know to the district
Attorneys office followed MR Harris from the
CCRB office on Church St, Plot

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

all the DA offices are involved with the
Plot & crimes at large. MR Harris was
accused of carrying fire arms and hand
guns. The Plot false accusations
to that way MR Gittens and the
DA office could have the Documents
MR Harris was carrying classified
state legal doc's on Nov 7 2018 at 3:15 pm.
MR Harris was victimize at a
Red collar crime coming from
the CCRB Building in Man, NY.
all 8 defendants have been plotting and
targeting MR Harris stealing ~~the~~ doc's
since 2016

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

MR Harris did not get injured.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Favor to Plaintiff 6.93 million Dollars.
I want the court to retrieve my legal
documentations. MR Harris is requesting
money damages for theft seven thousand dollars
the plot the conspiracy occurred Nov 7 2018 at
3:57pm Gilford Gritens followed MR Harris from
the CCRB Building framing MR Harris
typical conspiracy teaming up with
transit cops for fraudulent & criminal
aspects with the plot framing MR Harris
cycle 2 if perjury occurs MR Harris is granted 1683000
if false testimony occurs cycle 3 favor to 6.93 mill

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1 28, 2020

Signature of Plaintiff

LaQuan Delbert Harris

Printed Name of Plaintiff

LaQuan Delbert Harris